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Attorneys for Defendants
Epsilon Data Management, LLC,
Conversant LLC, and Citrus Ad
International, Inc.

HARRISON LAW LLC

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ATLAS DATA PRIVACY CORPORATION, as
assignee of individuals who are Covered
Persons, JANE DOE-1, a law enforcement
officer, JANE DOE-2, a law enforcement
officer, EDWIN MALDONADO, SCOTT
MALONEY, JUSTYNA MALONEY,
PATRICK COLLIGAN, PETER ANDREYEV,
and WILLIAM SULLIVAN,

Plaintiffs,
vs.

EPSILON DATA MANAGEMENT, LLC,
CONVERSANT LLC, CITRUS AD
INTERNATIONAL, INC., RICHARD ROES 1-
10, *fictitious names of unknown individuals* and
ABC COMPANIES 1-10, *fictitious names of*
unknown entities,

Defendants.

Case No. 3:24-cv-04168

**APPLICATION FOR EXTENSION OF
TIME TO ANSWER, MOVE, OR
OTHERWISE REPLY PURSUANT TO
LOCAL CIVIL RULE 6.1(b)**

(Document Electronically Filed)

Pursuant to Local Civil Rule 6.1(b), application is hereby made for a Clerk's Order extending the time within which Defendants Epsilon Data Management, LLC, Conversant LLC, and Citrus AD International, Inc. (collectively "Defendants") may answer, move, or otherwise reply to the Complaint filed by Plaintiffs, and it is represented that:

1. Defendants have not obtained any previous extensions with respect to Plaintiffs' Complaint.
2. Plaintiffs filed the Complaint in the Superior Court of New Jersey, Law Division, Monmouth County on February 8, 2024, but Defendants removed this matter to this Court on March 25, 2024.
3. Under Federal Rule of Civil Procedure 81(c)(2)(C), the time for Defendants to answer, move, or otherwise reply to Plaintiffs' Complaint currently expires on April 1, 2024.
4. With this extension, Defendants' answer, motion, or other reply to the Complaint would be due on April 15, 2024.

Dated: March 27, 2024

Respectfully submitted,

/s/ Ross A. Lewin
Ross A. Lewin
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Attorneys for Defendants
Epsilon Data Management, LLC,
Conversant LLC, and
Citrus Ad International, Inc

ORDER

The above application is hereby ORDERED GRANTED, and the time for Defendants to answer, move, or otherwise reply to Plaintiffs' Complaint is hereby extended to April 15, 2024.

ORDER DATED _____

MELISSA E. RHOADS, Clerk

By: _____
Deputy Clerk

CERTIFICATE OF SERVICE

I, Ross A. Lewin, hereby certify that on March 27, 2024, I caused a true and correct copy of the foregoing Application for Extension of Time to Answer, Move, or Otherwise Reply pursuant to Local Civil Rule 6.1(b) to be electronically filed with the Clerk of the District Court using the CM/ECF system, and to be served upon the following counsel of record for Plaintiffs via email and Federal Express:

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/s/ Ross A. Lewin

Ross A. Lewin